

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE:	X
	:
	: Case No.
APPLICATION UNDER 28 U.S.C. § 1782 TO TAKE	:
DISCOVERY FROM GOLDMAN SACHS & CO. LLC.,	:
UBS FINANCIAL SERVICES INC., MORGAN STANLEY	:
& CO. LLC, BNP PARIBAS USA, INC., SOTHEBY'S, INC.,	:
CHRISTIE'S INC., AND PHILLIPS AUCTIONEERS LLC	:

DECLARATION OF PAUL COSSU

I, PAUL COSSU, hereby declare, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney duly licensed to practice in the State of New York and am a member of Pryor Cashman LLP, counsel to Applicant Emmanuelle Corinne Traks (the “Applicant” or “Ms. Traks”). I am fully familiar with the facts and circumstances regarding this Application.

2. I submit this declaration in support of Ms. Traks’ Application for an Order Granting Leave to Obtain Discovery from Goldman Sachs & Co. LLC (“Goldman Sachs”), UBS Financial Services Inc. (“UBS”), Morgan Stanley & Co. LLC (“Morgan Stanley”), BNP Paribas USA, Inc. (“BNP”), Sotheby’s, Inc. (“Sotheby’s”), Christie’s Inc. (“Christie’s”), and Phillips Auctioneers LLC (“Phillips”) (collectively, the “Discovery Subjects”) for use in the Foreign Proceeding pursuant to 28 U.S.C. § 1782.

3. The Applicant seeks permission from the United States District Court for the Southern District of New York to serve Subpoenas *duces tecum* on the Discovery Subjects in the forms attached hereto as **Exhibits 1-7**, respectively.

4. A copy of a Proposed Order granting Applicant's request to serve her proposed Subpoenas on the Discovery Subjects is attached hereto as **Exhibit 8**.

5. A declaration from the Applicant's counsel of record in the Foreign Proceeding, Michaël Verhaeghe, is also submitted herewith. As explained by Mr. Verhaeghe, Ms. Traks filed a civil party criminal complaint on or about October 3, 2024 in the French-Speaking Court of First Instance in Brussels, Belgium. The documents sought from the Discovery Subjects are for use as evidence in the Foreign Proceeding.

6. The Discovery Subjects are found within the Southern District of New York.

7. Goldman Sachs is located in New York County. Goldman Sachs is headquartered in New York, with its principal executive offices located at 200 West Street, New York, NY 10282. A true and correct copy of the corporate registration information for Goldman Sachs available on the website of the New York Department of State is attached hereto as **Exhibit 9**.

8. UBS is located in New York County, with its New York headquarters branch located at 1285 Avenue of the Americas, New York, NY 10019. A true and correct copy of the page of the UBS website showing this information is attached hereto as **Exhibit 10**. UBS is a Delaware limited liability company that is registered to do business in New York. A true and correct copy of the corporate registration information for UBS available on the website of the New York Department of State is attached hereto as **Exhibit 11**.

9. Morgan Stanley is located in New York County. Morgan Stanley is a Delaware LLC registered to do business and headquartered in New York, with its principal executive offices located at 1585 Broadway, New York, NY 10036. A true and correct copy of the corporate registration information for Morgan Stanley available on the website of the New York Department of State is attached hereto as **Exhibit 12**.

10. BNP is located in New York County, with its headquarters located at 787 Seventh Avenue, New York, NY 10019. A true and correct copy of the page of the BNP website showing this information is attached hereto as **Exhibit 13**. A true and correct copy of the corporate registration information for BNP available on the website of the New York Department of State is attached hereto as **Exhibit 13-A**.

11. Sotheby's is located in New York County. Sotheby's is incorporated in the State of New York with its principal executive offices at 1334 York Avenue, New York, NY 10021. A true and correct copy of the corporate registration information for Sotheby's available on the website of the New York Department of State is attached hereto as **Exhibit 14**.

12. Christie's is located in New York County. Christie's is incorporated in the State of New York with its principal executive offices located at 20 Rockefeller Plaza, New York, NY 10020. A true and correct copy of the corporate registration information for Christie's available on the website of the New York Department of State is attached hereto as **Exhibit 15**.

13. Phillips is located in New York County, maintaining its global headquarters at 432 Park Avenue, New York, NY 10022. A true and correct copy of the page of Phillips' website containing this information is attached hereto as **Exhibit 16**. Phillips Auctioneers LLC is a Delaware limited liability company that is registered to do business in New York. A true and correct copy of the corporate registration information for Phillips available on the website of the New York Department of State is attached hereto as **Exhibit 17**.

14. Based on the Application, the Declaration of Michaël Verhaeghe, the Memorandum of Law, and all annexed exhibits to the foregoing, the undersigned respectfully requests that the Proposed Order submitted herewith be signed allowing the Applicants to serve the proposed

Subpoenas *duces tecum* on Goldman Sachs, UBS, Morgan Stanley, BNP, Sotheby's, Christie's, and Phillips.

Dated: New York, New York
 December 30, 2024



PAUL COSSU

Counsel for Applicant Emmanuelle Corinne Traks